

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE NON-JUDICIAL CIVIL FORFEITURE	:	
PROCEEDING REGARDING \$300,267 IN	:	<u>STIPULATION AND ORDER</u>
UNITED STATES CURRENCY AND \$132,691	:	
IN UNITED STATES CURRENCY SEIZED ON	:	24 Misc. 520
OR ABOUT MAY 16, 2024	:	
	:	
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WHEREAS, on or about May 16, 2024, the Drug Enforcement Administration (“DEA”) seized \$300,267 in United States currency, and \$132,691.00 in United States currency, (collectively, the “Seized Property”) from Kostiantyn Goshchevskyi (the “Claimant”) in Brooklyn, New York, and the DEA initiated administrative forfeiture proceedings against the Seized Property, pursuant to Title 21, United States Code, Section 881, by timely sending written notice of its intent to forfeit the Seized Property to all known interested parties;

WHEREAS, on August 15, 2024, the DEA received a claim from the Claimant asserting an interest in the Seized Property;

WHEREAS, the DEA subsequently referred the matter to the United States Attorney’s Office for judicial forfeiture;

WHEREAS, no other party has claimed an interest in the Seized Property;¹

WHEREAS, Title 18, United States Code, Section 983(a)(3)(A) provides that, “not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a Court in the district in which

¹ An additional claim to these assets was submitted to the DEA, but it is expected to be withdrawn.

the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties”;

WHEREAS, pursuant to Title 18, United States Code, Section 983(a)(3), the United States was required to file a civil complaint to forfeit the Seized Property no later than November 13, 2024;

WHEREAS, the Claimant, through his counsel Tony Mirvis, Esq., has consented to a 60-day extension of the deadline for the Government to file a complaint against the Seized Property;

WHEREAS, Tony Mirvis, Esq., attorney for the Claimant, represents and warrants that he is authorized to execute this Stipulation on behalf of his client, Kostiantyn Goshchevskyi; and

WHEREAS, the Government requests an extension of 60 days to file a complaint from November 13, 2024 to January 13, 2025;

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NOW, THEREFORE, IT IS HEREBY ORDERED, upon agreement of the above-referenced parties and pursuant to Title 18, United States Code, Section 983(a)(3)(A), that the time in which the Government is required to file a complaint for forfeiture of the Seized Property is extended from November 13, 2024, for a period of 60 days, up to and including January 13, 2025.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York



By: _____
Tara M. LaMorte
Assistant United States Attorney
26 Federal Plaza
New York, New York 10278
(212) 637-1041

November 13, 2024
DATE



By: _____
Tony Mirvis, Esq.
Attorney for Claimant
The Mirvis Law Firm
28 Dooley Street, 3rd Floor
Brooklyn, New York 11222
(718) 934-4141

November 11, 2024
DATE

SO ORDERED:

HONORABLE
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

DATE